

PAUL J. ANDRE (State Bar No. 196585)
pandre@kramerlevin.com
LISA KOBIALKA (State Bar No. 191404)
lkobialka@kramerlevin.com
JAMES HANNAH (State Bar No. 237978)
jhannah@kramerlevin.com
KRAMER LEVIN NAFTALIS
& FRANKEL LLP
990 Marsh Road
Menlo Park, CA 94025
Telephone: (650) 752-1700
Facsimile: (650) 752-1800

Counsel for Plaintiff
FINJAN, INC.

JENNIFER A KASH (Bar No. 203679)
jenniferkash@quinnemanuel.com
SEAN PAK (Bar No. 219032)
seanpak@quinnemanuel.com
IMAN LORDGOOEI (Bar No. 251320)
imanlordgooei@quinnemanuel.com
SAM STAKE (Bar No. 257916)
samstake@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
50 California Street, 22nd Floor
San Francisco, California 94111-4788
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Counsel for Defendants
PROOFPOINT, INC. and ARMORIZE
TECHNOLOGIES, INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FINJAN, INC.,

Plaintiff,

v.

PROOFPOINT, INC. and ARMORIZE
TECHNOLOGIES, INC.,

Defendants.

Case No.: 13-CV-05808-HSG

**STIPULATION AND ORDER
EXTENDING TIME FOR EXPERT
DISCOVERY**

Trial Date: March 7, 2016

1 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, Plaintiff Finjan, Inc. and Defendants
2 Proofpoint, Inc. and Armorize Technologies, Inc. (collectively, "the Parties"), by and through their
3 respective counsel, have met and conferred in an effort to agree upon a modified schedule for expert
4 discovery and have stipulated as follows:

5 WHEREAS, the opening and rebuttal expert reports in this matter were scheduled to be
6 exchanged respectively on October 7, 2015 and October 28, 2015;

7 WHEREAS, the completion of the expert discovery in this matter was scheduled on November
8 6, 2015;

9 WHEREAS, the Parties stipulated to extend the dates for the exchange of opening expert
10 reports, rebuttal expert reports and the completion of expert discovery;

11 WHEREAS, such extension was necessary to accommodate scheduling issues of the various
12 experts in this matter such as teaching schedules or (in one case) medical issues;

13 WHEREAS, the Parties stipulated to extend the deadline for exchanging opening expert reports
14 to October 14, 2015 and opening expert reports were served on that date;

15 WHEREAS, the Parties stipulated to extend the deadline for exchanging rebuttal expert reports
16 to November 4, 2015;

17 WHEREAS, the Parties have stipulated that expert discovery will be extended to November 13,
18 2015, and damages expert discovery to November 20, 2015;

19 NOW THEREFORE, the Parties hereby stipulate to and request (1) an extension of the
20 deadline to exchange opening expert reports from October 7, 2015 to October 14, 2015, (2) an
21 extension of the deadline to exchange rebuttal expert reports from October 28, 2014 to November 4,
22 2015, and (3) an extension of the completion of expert discovery from November 6, 2015 to November
23 13, 2015 for technical expert discovery and November 20, 2015 for damages expert discovery.

24 **IT IS SO STIPULATED.**

Respectfully submitted,

Dated: October 30, 2015

By: /s/ James Hannah

Paul J. Andre (SBN 196585)
Lisa Kobialka (SBN 191404)
James Hannah (SBN 237978)
KRAMER LEVIN NAFTALIS
& FRANKEL LLP
990 Marsh Road
Menlo Park, CA 94025
Telephone: (650) 752-1700
Facsimile: (650) 752-1800
pandre@kramerlevin.com
lkobialka@kramerlevin.com
jhannah@kramerlevin.com

Counsel for Plaintiff
FINJAN, INC.

Respectfully submitted,

Dated: October 30, 2015

By: /s/ Jennifer Kash

Jennifer A Kash (Bar No. 203679)
Sean Pak (Bar No. 219032)
Iman Lordgooei (Bar No. 251320)
Sam Stake (Bar No. 257916)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
50 California Street, 22nd Floor
San Francisco, California 94111-4788
Telephone: (415) 875-6600
Facsimile: (415) 875-6700
jenniferkash@quinnemanuel.com
seanpak@quinnemanuel.com
imanlordgooei@quinnemanuel.com
samstake@quinnemanuel.com
Counsel for Defendants
PROOFPOINT, INC. and ARMORIZE
TECHNOLOGIES, INC.

ATTESTATION PURSUANT TO L.R. 5-1(I)

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from any other signatory to this document.

/s/ James Hannah
James Hannah

ORDER

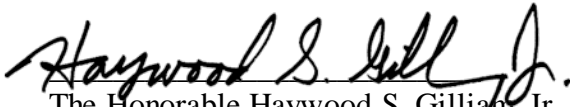
PURSUANT TO STIPULATION, IT IS SO ORDERED.

(1) The deadline for opening expert reports is extended from October 7, 2015, to October 14, 2015;

(2) The deadline for rebuttal expert reports is extended from October 28, 2014 to November 4, 2015; and

(3) The close of expert discovery is extended from November 6, 2015, to November 13, 2015 for technical expert discovery and to November 20, 2015 for damages expert discovery.

DATED: November 2, 2015


The Honorable Haywood S. Gilliam, Jr.
United States District Judge